

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

ST. LOUIS-KANSAS CITY CARPENTERS
REGIONAL COUNCIL, *et al.*,

Plaintiffs,

v.

GOULD FLOORING SERVICES, INC.,

Defendant.

Case No. 4:19-cv-02571 SNLJ

STIPULATION FOR ENTRY OF CONSENT JUDGMENT

Come now the parties and stipulate as follows:

1. Judgment shall be entered in favor of plaintiffs St. Louis-Kansas City Carpenters Regional Council, *et al.*, and against Gould Flooring Services, Inc. in the amount of \$81,951.16 consisting of \$78,158.77 in contributions through September 8, 2019, \$3,427.60 in liquidated damages and \$364.80 in interest.
2. Execution on the judgment amount set forth in paragraph 1, above, shall be stayed so long as defendants complies with paragraphs 3 and 4, below.
3. Defendants shall make payments to plaintiffs pursuant to the following schedule:
 - 1) \$10,000.00 on or before November 1, 2019;
 - 2) \$6,230.00 on or before December 1, 2019;
 - 3) \$6,230.00 on or before January 1, 2020;
 - 4) \$6,230.00 on or before February 1, 2020;
 - 5) \$6,230.00 on or before March 1, 2020;
 - 6) \$6,230.00 on or before April 1, 2020;
 - 7) \$6,230.00 on or before May 1, 2020;
 - 8) \$6,230.00 on or before June 1, 2020;
 - 9) \$6,230.00 on or before July 1, 2020;
 - 10) \$6,230.00 on or before August 1, 2020;

- 11) \$6,230.00 on or before September 1, 2020;
- 12) \$6,230.00 on or before October 1, 2020;
- 13) \$3,421.16 on or before November 1, 2020.

4. Defendant shall submit its reports and contributions to the Carpenters Funds on or before the date due as set forth in the collective bargaining agreement to which defendant is party for any work performed by the defendant which is covered by the Carpenters collective bargaining agreement.

5. If defendant fails to make a payment when due pursuant to paragraphs 2 or 3, above, plaintiffs' counsel shall provide written notice of such default to defendant's counsel, and defendant shall have five (5) business days from the date of such notice to cure any such default.

WHEREFORE, the parties stipulate to entry of a consent judgment according to the above terms.

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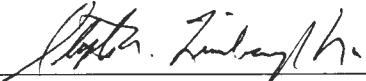
/s/ Greg A. Campbell
GREG A. CAMPBELL, #35381

Attorneys for Plaintiffs

/s/ Gilbert B. Williams (w/consent)
GILBERT B. WILLIAMS, #67876

Attorney for Defendant

SO ORDERED this 28th day of October, 2019



STEPHEN N. LIMBAUGH, JR.
UNITED STATES DISTRICT JUDGE